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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

MAXIMILIAN KLEIN and SARAH  
GRABERT, individually and on behalf of all  
others similarly situated,

Plaintiff,

vs.

FACEBOOK, INC., a Delaware corporation  
headquartered in California,

Defendant.

Case No. 5:20-cv-08570-LHK

**JOINT STIPULATED  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER CASES  
SHOULD BE RELATED AND  
[PROPOSED] ORDER**

**CIV. L.R. 3-12, 7-11**

MARK K. WASVARY, P.C., individually  
and on behalf of all others similarly situated,

Plaintiff,

vs.

FACEBOOK, INC., a Delaware corporation  
headquartered in California,

Defendant.

Case No. 21-cv-001518-SK

Case No. 5:20-cv-08570-LHK

**JOINT STIPULATED ADMINISTRATIVE MOTION TO CONSIDER WHETHER CASES SHOULD BE RELATED  
AND [PROPOSED] ORDER**

Pursuant to Civil Local Rules 3-12(b) and 7-11, Plaintiff Mark K. Wasvary, P.C. and Defendant Facebook, Inc. ("Parties") hereby file this Joint Stipulated Administrative Motion to determine whether *Mark K. Wasvary, P.C. v. Facebook, Inc.*, Case No. 21-cv-01518-SK (filed Mark 3, 2021) (attached as Exhibit A), should be related to the matter now pending before this Court, *Klein, et al. v. Facebook, Inc.*, Case No. 20-cv-08570-LHK. By and through their undersigned counsel, the Parties agree to the following:

- Under Local Rule 3-12(a), "An action is related to another when: (1) The actions concern substantially the same parties, property, transaction or event; and (2) It appears likely that there will be an unduly burdensome duplication of labor and expense or conflicting results if the cases are conducted before different Judges." Here, both criteria are satisfied.
- The *Wasvary* and *Klein* actions arise from substantially the same transactions and events. Both allege that Facebook acquired and maintained illegal monopolies in alleged social networking and connected markets through the same or similar conduct, including deception, misuse of data, and acquisitions.
- Because they involve similar issues of fact and law, it is appropriate to relate these actions in order to avoid an unduly burdensome duplication of labor and expense or conflicting results. Civil Local Rule 3-12(a)(2).

SO STIPULATED.

Dated: March 12, 2021

Respectfully submitted,

ANDRUS ANDERSON LLP

By: /s/ Jennie Lee Anderson

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**[PROPOSED] ORDER**

On March \_\_\_\_, 2021, Plaintiff Mark K. Wasvary, P.C. and Defendant Facebook, Inc. filed a Joint Stipulated Administrative Motion to Consider Whether Cases Should Be Related pursuant to Local Rule 3-12. The Court, having considered the papers and pleadings on file, and good cause appearing, hereby GRANTS the joint stipulated motion.

Accordingly, *Mark K. Wasvary, P.C. v. Facebook, Inc.*, Case No. 21-cv-01518-SK, is deemed related to *Klein et al. v. Facebook, Inc.*, Case No. 5:20-cv-08570-LHK, and shall be assigned to the undersigned Judge.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
HON. LUCY H. KOH  
UNITED STATES DISTRICT JUDGE